

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

**JACK STEPHEN PURSLEY,
AKA STEVE PURSLEY**

§
§
§
§
§
§

NO. 4:18-CR-575 (HUGHES)

United States' Motion to Exclude Defense Witness Tracey Salinas

On first day of trial in this matter, Pursley asked the Court to invoke “the rule” prohibiting fact witnesses from observing the trial testimony of other witnesses or communicating with other witnesses in the case about the substance of their testimony.

On Wednesday, the United States learned that one of the defendant’s own fact witnesses, Tracey Salinas, remained in the courtroom for opening statements and the entire first day testimony. No one from the prosecution team had previously met Ms. Salinas, and given the number of spectators in the audience, counsel for the United States assumed the woman who has now been identified as Ms. Salinas was either a reporter or a member of Mr. Pursley’s defense team.

The government respectfully submits that Ms. Salinas’s testimony is unnecessary in light of Mr. Bratcher’s testimony today. However, insomuch as Pursley’s own witness remained in the Courtroom for opening statements and hours of testimony after Pursley asked the Court to sequester the trial witnesses, the Court should not permit Ms. Salinas to testify at trial.

Respectfully submitted,

RICHARD E. ZUCKERMAN
PRINCIPAL DEPUTY
ASSISTANT ATTORNEY GENERAL



Sean Beaty
Grace E. Albinson
Jack A. Morgan
Trial Attorneys, Tax Division
U.S. Department of Justice
150 M Street, NE
Washington D.C. 20002
(202) 616-2717
Sean.P.Beaty@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will serve a copy of this document on all counsel of record.



Sean Beaty
Trial Attorney, Tax Division